

BEFORE THE  
POSTAL RATE COMMISSION

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OFFICE OF THE SECRETARY

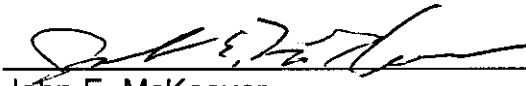
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

FOLLOW-UP INTERROGATORIES OF UNITED  
PARCEL SERVICE TO UNITED STATES POSTAL  
SERVICE WITNESS HUNTER  
(UPS/USPS-T5-89 through 90)  
(April 3, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby  
serves these follow-up interrogatories directed to United States Postal Service witness  
Hunter: UPS/USPS-T5-89 through 90.

Respectfully submitted,

  
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William J. Pinamont  
Phillip E. Wilson, Jr.  
Attorneys for United Parcel Service

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Of Counsel.

FOLLOW-UP INTERROGATORIES OF UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS HUNTER

UPS/USPS-T5-89. Refer to your response to interrogatory UPS/USPS-T5-29, which asked for "detailed tables for FY1998 in similar format [to Tables 1-3 of your testimony] by subclass for each mail class, including Inter-BMC, Intra-BMC, and DBMC revenue, piece, and weight estimates." Your response refers to files in the BRPW system which do not present that information without further analysis, and even then refers only to that portion of the estimates presented in Tables 1-3 which comes from the BRPW system (*i.e.*, not including information from that portion of the estimates in Tables 1-3 which comes from the DRPW system). In order to reduce the scope of this request, you need not provide the requested breakdown for mail classes and subclasses other than Parcel Post. However, as requested, please provide Parcel Post revenue, pieces, and weight for FY1998, broken down by Inter-BMC, Intra-BMC, and DBMC, separately for (i) that portion of the information in Tables 1-3 of your testimony which comes from the DRPW system, and (ii) that portion of the information in Tables 1-3 of your testimony which comes from the BRPW system.

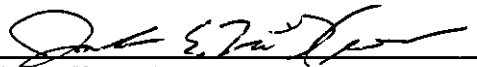
UPS/USPS-T5-90. Refer to your answer to interrogatory UPS/USPS-T5-27, which asked for "a copy of a report generated from the PERMIT system showing the total volume for Parcel Post separately for (i) Inter-BMC, (ii) Intra-BMC, and (iii) DBMC." Your response indicates that you "understand" that the PERMIT System reports "do not aggregate this information beyond the finance number level." However, you do not indicate that the PERMIT System reports **cannot** aggregate this information beyond the

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finance number level. Please provide the requested information aggregated beyond  
the finance number level.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

  
\_\_\_\_\_  
John E. McKeever  
Attorney for United Parcel Service

Dated: April 3, 2000  
Philadelphia, Pa.